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*Attorneys for Defendant Google LLC*

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

CHASOM BROWN, WILLIAM BYATT,  
JEREMY DAVIS, CHRISTOPHER  
CASTILLO, and MONIQUE TRUJILLO,  
individually and on behalf of all similarly  
situated,

Plaintiffs,

v.

GOOGLE LLC,  
Defendant.

Case No. 5:20-cv-03664-LHK-SVK

**DECLARATION OF JONATHAN TSE IN  
SUPPORT OF DEFENDANT GOOGLE  
LLC'S ADMINISTRATIVE MOTION TO  
SEAL THE COURTROOM FOR  
HEARING ON SPECIAL MASTER'S  
SEALED RECOMMENDATIONS AND  
ORDER DATED OCTOBER 20, 2021 (DKT  
NO. 299)**

Referral: Hon. Susan van Keulen, USMJ  
Hearing Date: November 4, 2021  
Hearing Time: 10:00 A.M.

1 I, Jonathan Tse, declare as follows:

2 1. I am a member of the bar of the State of California and an attorney with Quinn  
3 Emanuel Urquhart & Sullivan, LLP, attorneys for Defendant Google LLC (“Google”) in this action.  
4 I make this declaration of my own personal, firsthand knowledge, and if called and sworn as a  
5 witness, I could and would testify competently thereto.

6 2. I submit this declaration in support of Google’s Administrative Motion to Seal the  
7 Courtroom for hearing related to the parties’ Responses and Objections filed In Response to the  
8 Special Master’s Report and Orders on Referred Discovery Issues (“Special Master Report”) (Dkt.  
9 299).

10 3. On November 3, 2021, Plaintiffs confirmed that they expect to reference Google’s  
11 Protected Material at the hearing on November 4, 2021. Plaintiffs further informed Google that they  
12 do not oppose the instant motion.

13  
14 I declare under penalty of perjury of the laws of the United States that the foregoing is true  
15 and correct. Executed in San Francisco, California on November 3, 2021.

16  
17 DATED: November 3, 2021

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

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19 By /s/ Jonathan Tse  
Jonathan Tse

20 *Attorney for Defendant*  
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